

BRUNO & DEGENHARDT, P.C.

ATTORNEYS AT LAW

CHRISTOPHER BRUNO
ADMITTED N.Y., D.C. AND VA.

10618 JUDICIAL DRIVE, SUITE 703
FAIRFAX, VIRGINIA 22030
TELEPHONE (703) 352-8960
FACSIMILE (703) 352-8930

JANE DEGENHARDT BRUNO
ADMITTED N.Y. AND D.C.

November 13, 2018

VIA ECF

The Honorable Joanna Seybert
United States Senior District Judge
United States District Court
Eastern District Of New York
100 Federal Plaza
Central Islip, NY 11722

Re: *U.S. v. Chartier, et al.*, 17-CR-00372 (JS) *Pg. #6*
Defendant's Unopposed Motion to Modify Conditions of Release

Dear Judge Seybert:

We represent Defendant Erik Matz in the above-referenced matter. Mr. Matz respectfully requests the Court's permission to travel outside the geographical areas set as a condition of his bail. The Government and Pretrial Services do not object to Mr. Matz's request to travel.

Specifically, Mr. Matz requests permission to travel to Las Vegas, Nevada in order to assist his father with the sale of his condominium, and to help remove his dad's possessions from the residence. Mr. Matz will arrive in Las Vegas on Sunday November 18, 2018, and return to New York on Tuesday November 20, 2018. Mr. Matz's complete travel itinerary, as well as his contact information, will be provided to Pretrial Services in advance of the trip.

As stated above, we have communicated with AUSA Whitman Knapp and Pretrial Officer Mallori Brady about this request, and neither has any objection.

Thank you for your consideration regarding this request.

Respectfully submitted,

/s/

Christopher Bruno

cc: AUSA Whitman Knapp (by ECF)
U.S. Pretrial Services Officer Mallori Brady (by email)

Approved.

SO ORDERED:

/s/ JOANNA SEYBERT
Joanna Seybert, USDJ
Dated: 11/14/2018
Central Islip, NY